

**Hearing Date: February 22, 2023 at 10:00 AM**  
**Objection Deadline: February 15, 2023 at 4:00 PM**

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and

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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	:	
<i>In re</i>	:	Chapter 11
	:	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	:	Case No. 22-10943 (MEW)
	:	(Jointly Administered)
Debtors. <sup>1</sup>	:	
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**NOTICE OF APPLICATION OF DEBTORS PURSUANT TO SECTIONS  
327(e) AND 330 OF THE BANKRUPTCY CODE FOR AUTHORITY TO EMPLOY  
AND RETAIN PAUL HASTINGS LLP AS SPECIAL REGULATORY AND  
CONFLICTS COUNSEL, EFFECTIVE AS OF THE PETITION DATE**

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby file this application (the “Application”) for entry of an order, substantially in the form attached to the Application as Exhibit A, pursuant to sections 327(e)

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

and 330 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532, Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, and Rule 2014-1 of the Local Bankruptcy Rules for the Southern District of New York, authorizing the retention and employment of Paul Hastings LLP as the Debtors' special regulatory and conflicts counsel.

**PLEASE TAKE FURTHER NOTICE** that the Application will be heard at a hearing scheduled for **February 22, 2023, at 10:00 a.m.** (prevailing Eastern Time) (the "Hearing") before the Honorable Michael E. Wiles, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408 (the "Bankruptcy Court"), or at such other time as the Bankruptcy Court may determine.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Bankruptcy Court's General Order M-543, dated March 20, 2020 ("General Order M-543"), the Hearing will be conducted telephonically. Parties wishing to participate in the Hearing should do so by making arrangements through CourtSolutions by visiting <https://www.court-solutions.com>.

**PLEASE TAKE FURTHER NOTICE** that objections or responses, if any, to the Application shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of *In re Voyager Digital Holdings, Inc.*, No. 22-10943 (MEW) by registered users of the Court's electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court's website at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received by **February 15, 2023, at 4:00 p.m.** (prevailing Eastern Time), by (i) the entities on the Master Service List available on the case website of the Debtors at <https://cases.stretto.com/Voyager> and (ii) any person or entity with a particularized interest in the subject matter of the Application.

**PLEASE TAKE FURTHER NOTICE** that copies of the Application and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Voyager>. You may also obtain copies of the Application and other pleadings filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Bankruptcy Court to grant the relief requested in the Application, or if you want the Bankruptcy Court to consider your views on the Application, then you or your attorney must attend the Hearing. If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Application and may enter orders granting the relief requested in the Application.

*[Remainder of page intentionally left blank]*

**PLEASE TAKE FURTHER NOTICE** that if you do not timely file and serve a written objection to the relief requested in the Application, the Bankruptcy Court may deem any opposition waived, treat the Application as conceded, and enter an order granting the relief requested in the Application without further notice or hearing.

Dated: January 25, 2023

New York, New York

/s/ Matthew M. Murphy

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